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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARIE
HAYRAPETIAN IN SUPPORT OF
GOOGLE LLC'S RENEWED
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE MATERIAL
ASSOCIATED WITH
PLAINTIFFS' REQUEST FOR AN
ORDER FOR GOOGLE TO SHOW
CAUSE**

Referral: Hon. Susan van Keulen, USMJ

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s
7 Renewed Administrative Motion To Seal Portions Of The Material Associated With Plaintiffs’
8 Request For An Order For Google To Show Cause For Why It Should Not Be Sanctioned For
9 Discovery Misconduct (“Plaintiffs’ Motion”). In making this request, Google has carefully
10 considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.
11 Google makes this request with the good faith belief that the information sought to be sealed consists
12 of Google’s confidential and proprietary information and that public disclosure could cause
13 competitive harm.

14 3. Google respectfully seeks to renew the following motions to seal in connection with
15 Plaintiffs’ Motion at: Dkt. Nos. 429, 510, 527, 529, 535, 548, 551, 582 (motions to seal); *see also*
16 Dkt. Nos. 514, 520, 550, 557 (declarations filed in support of motions to seal).

17 4. The information requested to be sealed contains Google’s confidential and
18 proprietary information regarding highly sensitive features of Google’s internal systems and
19 operations, including details related to Google’s internal projects, internal identifiers, data signals
20 and logs, and their proprietary functionalities, as well as internal metrics and investigation into
21 financial impact of certain features, that Google maintains as confidential in the ordinary course of
22 its business and is not generally known to the public or Google’s competitors.

23 5. Such confidential and proprietary information reveals Google’s internal strategies,
24 system designs, and business practices for operating and maintaining many of its important services,
25 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-
26 3.

27 6. Public disclosure of such confidential and proprietary information could affect
28 Google’s competitive standing as competitors may alter their identifier system designs and practices

1 relating to competing products. It may also place Google at an increased risk of cyber security
2 threats, as third parties may seek to use the information to compromise Google's data sources,
3 including data logs, internal data structures, and internal identifier systems.

4 7. For these reasons, Google respectfully requests that the Court seal the material
5 itemized in the Renewed Administrative Motion To Seal Portions Of The Material Associated With
6 Plaintiffs' Motion.

7 I declare under penalty of perjury of the laws of the United States that the foregoing is true
8 and correct. Executed in Los Angeles, California on May 31, 2022.

9
10 DATED: May 31, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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12
13 By /s/ Marie Hayrapetian

14 Marie Hayrapetian

15 Attorney for Defendant
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